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**BEFORE THE ARIZONA CORPORATION COMMISSION**

WILLIAM A. MUNDELL  
COMMISSIONER  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER

2002 AUG 19 P 3:52

AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST'S NOTICE OF FILING  
LATE-FILED EXHIBIT FOR ESCHELON WORKSHOP**

Qwest Corporation ("Qwest") hereby provides the attached Exhibit D as a late-filed exhibit to the Echelon workshop held July 30 and 31, 2002. Exhibit D contains supplemental information relating to the information contained in Qwest's late-filed Exhibit A.

RESPECTFULLY SUBMITTED this 19<sup>th</sup> day of August, 2002.

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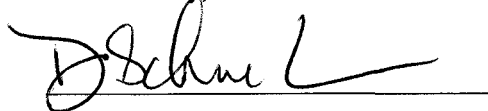
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A handwritten signature in black ink, appearing to read "D. Schneid", is written over a horizontal line.

DSCHNEID/1331993/67817.150

## Exhibit D

Qwest is submitting this document to more fully explain certain responses submitted on August 8, 2002. The information provided below explains acronyms, provides a more detailed description of referenced reports, or provides more detail on selected responses.

### **1. Network outage process – Abnormal Network Condition Report (ANCR)**

Qwest would like to further describe the ANCR system and how a CLEC may request non-confidential outage information from Qwest. The email provided by Eschelon containing information about a prior network outage is the email sent by the ANCR system for notification purposes. The confidential statement is generated by the ANCR system and cannot be removed. Even if no such system constraint existed, Qwest believes it would be inappropriate to remove the confidentiality footer. In responding to an outage, Qwest makes available the best information it has via the ANCR system. However, information gained in responding to emergency outages is very dynamic. For example, there are instances where, at first, a third party's action appears to have contributed to an outage. Pertinent information regarding the third party's actions may be contained in the ANCR and may later need to be retracted in subsequent notifications because additional facts establish that the third party was not involved. Because of these types of dynamic changes, it would be inappropriate for Qwest to provide notifications without a confidentiality footer.

However, to address CLECs' need for information about an outage, Qwest has an existing process for CLECs to request a root cause analysis without a confidentiality footer that pertains to a network outage and may be provided to their customers. Such a request should be

made through their service or account manager as described in the Qwest PCAT at URL:

<http://www.qwest.com/wholesale/clecs/accountmanagers.html>, sixth bullet under Service Team responsibilities.

## **2. CopperMax status**

To further describe the nature of the August 15<sup>th</sup> meeting, Qwest would like to clarify that the August 15 meeting is not a CMP meeting. It is Qwest's current position that this is not a CMP issue; rather, this is a follow up ad hoc meeting with the CLECs. Qwest subject matter experts will meet with the CLECs to answer their questions or concerns about CopperMax. The only potential area of disagreement (in Qwest's judgment) would be whether the deployment of CopperMax is within the scope of CMP. If it is within the CMP scope, Qwest will follow the CMP procedures. If it isn't within the scope of CMP, Qwest will send out a network notification to the CLECs informing them of the implementation date for CopperMax.

## **3. SRP for activation of AIN features**

Eschelon requested that Qwest provide a list of USOCs available in specific switches. A list of USOCs in specific switches can be viewed on the ICONN database at the following URL: [http://www.uswest.com/cgi-bin/iconn/switch\\_features.cgi](http://www.uswest.com/cgi-bin/iconn/switch_features.cgi). Furthermore, the document provided in the PCAT titled 'USOCs Not Available with UNE-P' detail by USOC and English description all products, services, and packages not available with UNE-P. This list includes AIN features.

Additionally, the USOC/FID Finder tool (<http://usocfidfind.qwest.com/>) may be accessed by the CLECs to determine greater detail about each of the USOCs indicated as not available. A

hotlink will be provided in the Optional Features section of the UNE\_P General PCAT during the late August 2002 revision.

In Qwest's August 8<sup>th</sup> filing, there may have been some confusion about the difference between Attachements 1 and 2. Attachment 1, the document titled 'USOCs Not Available with UNE-P', is a draft version of an updated (and slightly renamed) USOC list to be announced via the established CMP guidelines and posted to the UNE-P General Information PCAT by the end of August 2002. Note that this list includes the USOCs particularly mentioned at the Workshop in July, including RCFVF and RCFVE.

Attachment 2, the document titled 'Features Unavailable with UNE-P', is the current version of essentially the same list and is what is currently published on-line.

Regarding the length of the list detailing USOCs that are not available with UNE-P: it is critical to note that all features (or their functional equivalent) that are available in the retail/resale environment (excluding Qwest VMS, AIN, promotions, and other established exceptions) are available with UNE-P. The bulk of the USOCs included on this list are related to Qwest VMS. Qwest provides the list so that CLECs can easily and quickly reference one snapshot document as they are converting/installing orders. The 'description' is intended to be no more than a brief English translation of the USOC. If for some reason the CLEC needs additional detail, the USOC/FID Finder will provide significantly more detail, including extended USOC definition, functionality, state availability, etc. The URL for the USOC/FID finder is <http://usocfidfind.qwest.com>.

## **7. Features not available for UNE-P**

Because parties may not be knowledgeable about Market Expansion Lines (MELs), Qwest provides a more detailed description of MELs. A Market Expansion Line designated by RCFVF provides the customer a local telephone number that establishes a presence in a community without having to have an office in that community. It has been known in the past as a Remote Call Forwarding feature. It is an exchange service that uses a telephone number to forward incoming calls to another telephone number. The feature is programmed in the MEL central office so calls coming into the MEL telephone number are automatically forwarded to the destination telephone number. No physical location is needed. Listings for MEL can include the distant address where the calls are being answered. This creates unique needs for listings & directory delivery.

The MEL that is designated by RCFVE is an interstate number termination MEL. The description provided above applies except that this type of MEL provides for a number to be forwarded outside the state or LATA boundaries.

Both explanations are made available to CLECs in Qwest's USOC/FID finder.

#### **8. DSL Disconnect in Error Interval**

In the workshop on July 30<sup>th</sup> and 31<sup>st</sup>, 2002, Qwest referenced a specific instance with Eschelon ordering DSL. In this specific instance discussed at the workshop, Qwest resolved the situation where Eschelon had intended to issue an order for DSL but had failed to put DSL on the order. In this instance, Qwest escalated the issue and added DSL to the existing order with the standard interval due date. Qwest provisioned the DSL service on the original due date. In situations involving disconnects in error, Qwest typically restores service in less than 24 hours.

In fact, in 21 of these types of disconnect in error situations for Eschelon during the months of June and July, 2002, Qwest restored service in one hour and 20 minutes on average.

These excellent results were attained by adhering to Qwest's current process of issuing a correcting service order with the applicable standard interval and escalating immediately to restore service as soon as possible. This process applies equally to wholesale and retail units. Clearly, there is no need to impose repair intervals on Qwest as Eschelon suggests.

**9. DPA in Central Region**

Because parties may not be familiar with the term DPA, Qwest provides a more detail explanation. In the ROC I Reply Declaration of Lori Simpson, Qwest fully responds to the DPA issue on pages 2 and 3. It is reproduced here in its entirety:

“Eschelon states that Qwest does not have back-end system records containing the DSL technical information needed for repair of the DSL service when provided with UNE-P Centrex combinations.<sup>1</sup> First there are several types of UNE-P Centrex:

- a) UNE-P Centrex 21
- b) UNE-P Centrex Plus
- c) UNE-P Centron

For UNE-P Centrex 21 combinations, Qwest has repair records that include information on DSL service. However, under certain limited circumstances, for UNE-P Centrex Plus and UNE-P Centron with DSL, some repair records do not include information about DSL service. This situation occurs in Qwest's Central (Colorado) and Eastern (Iowa, Nebraska and North Dakota) region states when a Field Identifier (“FID”) called the “Different Premises Address” (“DPA”) FID is included with a main station line at the DPA on UNE-P Centrex or UNE-P Centron customer records, and where there is DSL service at the DPA.

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<sup>1</sup> Eschelon Comments at 9-10.

CLECs often provide lines from a single UNE-P Centrex or UNE-P Centron system to many different end users at different addresses. To keep accurate records, Qwest uses DPAs to record the appearance of main station lines at different addresses than the main address for the Centrex system. However, the use of this DPA FID also causes certain repair records not to be created when DSL is provisioned at the DPA.

Qwest has identified a manual means by which Qwest's repair personnel may have access to the information they need to take repair reports on DSL service provided with UNE-P Centrex Plus and UNE-P Centron. CLECs are not required to do anything differently. Qwest will implement this manual solution by the end of August 2002. A long-term mechanized solution will be necessary and is also being investigated and will be implemented as it is identified."

It is important to note that currently, as well as at the time of the Arizona workshop, Qwest had fully developed the manual solution referenced in Ms. Simpson's declaration and awaits any order activity involving Centrex Plus/Centron with Qwest DSL service. This manual solution addresses an extremely low volume of activity. As of July 15, 2002, there were only 15 Resale and UNE-P Centrex Plus/Centron accounts with Qwest DSL service in the entire Qwest 14 state territory, with no accounts in Arizona. Given the minimal subscription of Qwest DSL with these types services, and the extensive level of effort and cost to implement a mechanized work around, as well as Qwest's confidence that the manual workaround will address the identified DPA concern, Qwest does not believe that a mechanized solution is of value..

#### **11. Collocation Issues Not Discussed at Workshop**

##### **a. Collocation Dust Contamination/Danger to Equipment**

The question may arise as to who pays for the clean up of collocation dust. If evidence is provided indicating that either the CLEC or Qwest or a Qwest contractor has caused dust

contamination, the party causing the contamination shall be responsible for the clean up. Qwest will update the collocation PCAT accordingly.

**b. Preliminary APOT**

Again, because parties may not be familiar with the term Alternate Point of Termination (APOT), Qwest would like to elaborate. APOT information identifies specific collocation terminations at the CLEC's side of the InterConnection Distribution Frame (ICDF) or the frame where the service terminates and is used for the purpose of ordering UNEs, Finished Services, etc. The CLEC receives two APOT forms: a Preliminary APOT form 15 days prior to the RFS date and a Final APOT form. The final APOT is provided once the RFS has been met and the CLEC pays their final 50% (or balance due) of the nonrecurring charges contained in the collocation price quote.

**g. Quotes for Undefined Rate Elements**

Eschelon addressed a difference in two quotes for collocation, emphasizing that the more recent quote was significantly higher than the earlier quote. Qwest would like to specifically address the difference in quotes. Unlike the nearly \$20,000 difference in cost Ms. Clauson and Ms. Powers spoke to during the workshop, research into the issue only shows a difference of \$6,379.17 between the quotes. The original quote dated February 11, 2000 on BAN C01LC01 was \$47,130.59 and the 3 bay addition dated May 16, 2002 on BAN C21LC20 was \$53,509.76. As a general matter, differences are to be expected because more than 2 years elapsed between the quotes and the Arizona cost docket decision was put into the effect. Specifically, there is one difference contained in the application that needs to be noted. Eschelon requested only 300 DS-0 terminations on the first application for a total cost of \$2,149.71 while on the second

application Eschelon requested nearly 4 times that amount or 1,100 DS-0 terminations. This by itself accounts for a significant difference. Additionally, Qwest notes that while the non-recurring costs were increased for having these additional terminations, the monthly recurring costs were actually \$40.51 less than the recurring costs for Eschelon's initial request.

**h. Adjacent Off-Site Collocation**

Also in the July workshop, Eschelon referenced a Southwestern Bell tariff related to the issue of adjacent off-site collocation. The tariff in question is the Local Access Service Tariff in Kansas for Southwestern Bell Telephone Company. The section on Adjacent Off-site Arrangement went into effect June 14, 2000 and the change is noted on the 1<sup>st</sup> Revised Sheet 2. This language limits the deployment of Adjacent Off- site to only those offices "Where Physical Collocation space within a SWBT Eligible Structure is Legitimately Exhausted, and the Collocator's Adjacent On-site space is not within 50 ft. of the Eligible Structure's outside perimeter wall, the Collocator has the option and SWBT shall permit an Adjacent Structure Off-site Arrangement, to the extent technically feasible." While SWBT may have made a business decision to offer this product, it should not drive Qwest to the same decision especially in light of the fact that the SWBT offer goes well beyond and outside of the FCC's definition of collocation and the term "premises". A CLEC is not precluded from locating adjacent to or near to a Qwest premises, it just is not "co-location."<sup>2</sup>

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<sup>2</sup> See Advanced Services Order on Reconsideration, CC Docket No. 98-147 (rel. Aug. 10, 2000) ¶ 44. This issue was directly addressed by the FCC: "This definition [premises] of course, *excludes* land and buildings in

**12. DSL Process**

In its August 8<sup>th</sup>, 2002 filing, Qwest stated that 133 orders DSL orders flowed without any disconnects in error. The quoted number of 133 orders is the UNE-STAR to UNE-P orders, which is a subset of the total number of Eschelon orders processed during the timeframe from July 12-July 26, 2002. During this same timeframe, there were 44 new orders for UNE-P w/DSL. None of the 44 orders was disconnected in error. One hundred percent of the total 177 orders flowed through with no disconnects in error.

**Improved Escalation Process - Scenario**

Qwest included 3 sub-bullets related to Qwest's order escalation process in its August 8<sup>th</sup> filing. One of the 3 sub-bullets specified a 24 turnaround timeframe. In fact, all 3 sub-bullets have a 24-hour turnaround timeframe.

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which the incumbent LEC has no interest. In that circumstance, the incumbent LEC and its competitors have an equal opportunity to obtain space within which to locate their equipment."